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San Diego County
DEPT. OF PLANNING & LAND USE
January 24, 2012

Patrick Brown
Matthew Schneider
DPLU Project Managers
5201 Ruffin Road, Suite B
San Diego, CA 92123-1666

RE: Wind Energy Ordinance & General Plan Amendment DEIR; POD 10-007, LOG NO. 09-00-003; SCH NO. 2010091030 & Tule Wind General Plan Amendment

Dear Mr. Schneider,

At our regular meeting held on Jan. 18, our Rural Economic Action League (REAL) group voted to go on record with the following positions:

1. WE STRONGLY OPPOSE THE PROPOSED DRAFT EIR FOR THE WIND ENERGY ORDINANCE AND GENERAL PLAN AMENDMENT ; THE REDUCED TURBINE PROJECT ALTERNATIVE ; AND THE TULE WIND PLAN AMENDMENT
2. WE STRONGLY SUPPORT OF THE NO PROJECT ALTERNATIVE AS BEING THE MOST PROTECTIVE OF RURAL COMMUNITIES, RESIDENTS, AND RESOURCES.
3. WE STRONGLY SUPPORT THE BOULEVARD PLANNING GROUP'S REQUEST FOR A COUNTY-WIDE MORATORIUM ON LARGE-SCALE INDUSTRIAL WIND TURBINE PROJECTS AND THE INITIATION OF LEGITIMATE INDEPENDENT SCIENCE-BASED RESEARCH STUDIES TO DETERMINE SAFE SETBACKS¹, IF ANY, FROM OPERATING LARGE WIND TURBINE PROJECTS CAN BE DETERMINED AS ADEQUATE TO PROTECT PUBLIC HEALTH AND SAFETY FROM PROJECT-RELATED EMISSIONS / IMPACT/EFFECTS.

Our position is based on but not limited to the following:

- The County's General Plan and the Boulevard Community Plan was just approved in August and should not be amended (as proposed)² in a manner that reduces protections for rural communities, impacted property owners, and sensitive resources, in order to facilitate and streamline the permitting of unnecessary, disruptive, and very expensive large-scale industrial wind energy projects.
- Large-scale wind turbine projects require an extensive land base³, and air space, in addition to new power line and substation projects that represent an increased risk of

¹ Explicit Cautionary Notice To Those Responsible for Wind Turbine Siting Decisions:

<http://waubrafoundation.com.au/Y2NpZD0xNmNhaWQ9MTMmYWIkPSZicmM9MTQ0OTg1MjIyOQA%3D%3D>

² http://www.sdcounty.ca.gov/dplu/regulatory/docs/3800-11-001_CEQA_REVIEW_111116/3800-11-001-GPAR.pdf

³ Tule Wind 15,000 acres:

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wildfires⁴ in underserved fire-prone rural areas, most of which are designated as High Fire Severity Zones⁵ through potential malfunctioning turbine equipment and related infrastructure that can result in catastrophic wildfires, increased fire insurance rates, or loss of fire insurance coverage due to increased risk.

- Industrial wind turbine projects are not a "civic use". They are for-profit commercial industrial projects and should be recognized as such, regardless of which community or sensitive lands they are proposed in or adjacent to.
- Large-scale Industrial wind turbine projects, with turbines up to 500 feet tall, are not compatible in bulk and scale with historic rural land uses, under County authority, and represent a degrading and invasive visual intrusion, day and night (with FAA required lighting), regardless of which San Diego County community's viewshed is impacted.
- Adverse health effects have been documented in people living in homes up to 10 km (6.21 miles) of industrial wind energy projects and substations, with homes reportedly abandoned near wind projects in the US, Australia, Canada, Japan, and throughout Europe as documented by various groups including The Society for Wind Vigilance⁶, The Waubra Foundation⁷, European Platform Against Windfarms⁸, North American Platform Against Windfarms⁹, Industrial Wind Action¹⁰, National Wind Watch¹¹ and others.
- Significant adverse impacts to wildlife¹² and livestock, from industrial wind turbine project operations, has been documented by many of the same groups noted above, in addition to national non-profit environmental organizations, news media, and others.
- These industrial projects can also represent a significant loss of property values^{13, 14, 15} and quality of life for impacted non-participating property owners as already documented by numerous professional real estate appraisers, and others, who are *not* associated with the wind industry or government funded studies meant to support and promote wind energy projects.

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⁵ http://www.fire.ca.gov/fire_prevention/fhsz_maps/fhsz_maps_sandiego.php

⁶ www.windvigilance.com

⁷ www.waubrafoundation.com.au

⁸ <http://www.epaw.org/>

⁹ <http://www.na-paw.org/>

¹⁰ www.windaction.org

¹¹ <http://www.wind-watch.org/>

¹² USFWS Effects of Noise on Wildlife: <http://www.fws.gov/windenergy/docs/Noise.pdf>

¹³ <http://www.sdcounty.ca.gov/dplu/docs/ZA/RealEstateImpactEval.pdf>

¹⁴ <http://www.wind-watch.org/documents/property-values-affected-by-wind-farms/>

¹⁵ <http://www.wind-watch.org/documents/property-values-affected-by-wind-farms/>

¹⁵ <http://www.wind-watch.org/documents/ben-hoen-on-need-for-property-value-guarantee/>

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Response to Comment Letter II

Rural Economic Action League

January 24, 2012

- II-1** The County acknowledges the commenter's opposition to the proposed project, the EIR, the General Plan Amendment, the reduced alternatives identified in the DEIR, and the proposed Tule General Plan Amendment. The information in this comment will be in the Final EIR for review and consideration by the decision makers.
- II-2** The County acknowledges the commenter's support for the No Project Alternative.
- II-3** The comment requests a moratorium for large wind turbine projects and the initiation of new studies to evaluate impacts from large wind turbines. This recommendation would conflict with the project objectives of the Wind Energy Ordinance. Nevertheless, the commenter can present this option to the County Board of Supervisors as a project alternative during the hearing process. In addition, this comment will be included in the Final EIR and staff report to the decision makers.
- II-4** The County acknowledges the commenter's opposition to the proposed General Plan Amendment. The information in this comment will be in the Final EIR for review and consideration by the decision makers.
- II-5** Issues raised in this comment are not inconsistent with the existing content of the DEIR. Section 2.6.3.7 identifies potentially significant impacts associated with wildland fires for both large and small wind turbines. It should be noted, however, that issues related to fire insurance rates/coverage were not discussed in the DEIR since this topic is not related to environmental impacts. See CEQA Guidelines section 15131.
- II-6** This comment does not raise a significant environmental issue for which a response is required. For clarification, large wind turbine projects are categorized as Major Impact Services and Utilities in the Zoning Ordinance, which is a civic use type pursuant to Section 2105.a. The proposed Wind Energy Ordinance will not change this classification; therefore, large wind turbines would still fall under civic use types.
- II-7** The County agrees that large wind turbine projects will have significant aesthetic impacts. This is discussed in Section 2.1 of the DEIR.
- II-8** There is much disagreement among experts regarding potential adverse health effects from wind turbine projects. The County seeks to include the most up-to-date information for public disclosure and consideration by the decision makers. As such, this comment will be included in the final EIR for consideration by decision makers.

Draft Responses to Comments

It should be noted, however, that disagreement among experts does not result in an inadequate EIR (CEQA Guidelines Section 15151).

II-9 The County agrees that large wind turbine projects may result in significant impacts to wildlife, such as birds and bats, and to agricultural resources. See DEIR Sections 2.4.7 and 2.2.7.

II-10 This comment raises concerns regarding property values. This topic was not evaluated in the DEIR since it is not related to environmental impacts. See CEQA Guidelines section 15131. However, this type of information can be presented to decision makers for their consideration during the hearing process for the project.